

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**NINTH INTERIM APPLICATION OF FTI CONSULTING, INC., FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
SEARS HOLDINGS CORPORATION, *ET AL.* FOR INTERIM ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM JULY 1, 2021 THROUGH OCTOBER 31, 2021**

Name of Applicant:

FTI Consulting, Inc.

Authorized to provide Professional Services
to:

Official Committee of Unsecured Creditors
of Sears Holding Corporation, *et al.*

Date of Retention:

December 19, 2018, *nunc pro tunc* to October
25, 2018

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Period for which compensation and reimbursement is sought: July 1, 2021 through October 31, 2021

Amount of Compensation sought as actual, reasonable and necessary \$266,139.00

Amount of Expense Reimbursement sought as actual, reasonable and necessary \$0.00

Total Fees and Expenses Due: \$266,139.00

This is a: ____ monthly X interim ____ final application

**SUMMARY OF MONTHLY FEE STATEMENTS
DURING THE APPLICATION PERIOD**

Date Filed Docket No.	Period Covered	Fees Requested (100% of Fees)	Fees Due (80% Fees)	Holdback (20% Fees)	Expenses Requested (100% Expenses)	Amounts Paid to Date	Remaining Unpaid Amount
9/28/21 Dkt. 9856	7/1/21 - 8/31/21	\$ 143,383.50	\$ 114,706.80	\$ 28,676.70	\$ -	114,706.80	\$ 28,676.70
11/23/21 Dkt. 10100	9/1/21 - 9/30/21	\$ 46,036.00	\$ 36,828.80	\$ 9,207.20	\$ -	36,828.80	\$ 9,207.20
12/1/21 Dkt. 10117	10/1/21 - 10/31/21	\$ 76,719.50	\$ 61,375.60	\$ 15,343.90	\$ -	-	\$ 76,719.50
TOTAL		\$ 266,139.00	\$ 212,911.20	\$ 53,227.80	\$ -	\$ 151,535.60	\$ 114,603.40

**SUMMARY OF SERVICES BY PROFESSIONAL
DURING THE APPLICATION PERIOD**

Professional	Position	Specialty	Billing Rate	Total Hours	Total Fees
Nelson, Cynthia A	Sr Managing Dir	Retail	\$ 1,120	0.2	\$ 224.00
Simms, Steven	Sr Managing Dir	Restructuring	1,295	0.7	906.50
Star, Samuel	Sr Managing Dir	Restructuring	1,165	2.4	2,796.00
Diaz, Matthew	Sr Managing Dir	Restructuring	1,120	46.9	52,528.00
Eisler, Marshall	Managing Director	Restructuring	885	92.2	81,597.00
Kim, Ye Darm	Sr Consultant	Restructuring	635	14.9	9,461.50
Shapiro, Jill	Sr Consultant	Restructuring	580	187.3	108,634.00
Lampert, Grace	Consultant	Restructuring	430	22.9	9,847.00
Hellmund-Mora, Marili	Project Asst	Restructuring	290	0.5	145.00
TOTAL				368.0	\$ 266,139.00

**SUMMARY OF HOURS BY PROJECT CATEGORY INCURRED
DURING THE APPLICATION PERIOD**

Task Code	Task Description	Total Hours	Total Fees
1	Current Operating Results & Events	5.2	\$ 4,278.00
3	Financing Matters (DIP, Exit, Other)	285.6	\$ 212,218.00
5	Real Estate Issues	0.2	224.00
11	Prepare for and Attend Court Hearings	1.5	\$ 1,747.50
17	Wind Down Monitoring	14.3	10,749.50
18	Potential Avoidance Actions & Litigation	47.6	27,040.50
21	General Mtgs with UCC & UCC Counsel	2.9	2,524.50
24	Preparation of Fee Application	10.7	7,357.00
TOTAL		368.0	\$266,139.00

FTI Consulting, Inc. (together with its wholly owned subsidiaries, the “**Applicant**” or “**FTI**”), financial advisor to the Official Committee of Unsecured Creditors (the “**Committee**”) of Sears Holdings Corporation, *et al.*, (collectively, the “**Debtors**”), hereby submits its Ninth Interim Fee Application (the “**Fee Application**”) for allowance of compensation for professional services performed by FTI for the period commencing July 1, 2021 through and including October 31, 2021 (the “**Application Period**”) and reimbursement of its actual and necessary expenses incurred during the Application Period, and respectfully represents as follows:

INTRODUCTION

1. FTI provided services to the Committee in accordance with the instructions and directions of the Committee. FTI is compensated on an hourly fee basis, plus reimbursement of actual and necessary expenses incurred by FTI.

2. By this Fee Application, FTI seeks allowance of (i) compensation for actual and necessary professional services rendered by FTI as financial advisor to the Committee for the Application Period in the amount of \$266,139.00 and (ii) reimbursement for expenses incurred in the Application Period in the amount of \$0.00, for a total of \$266,139.00 for the Application Period.

3. The statutory bases for the relief requested herein are sections 330, 331, and 1103 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of New York (the “**Local Rules**”), and the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases, effective as of November 1, 2013 (the “**U.S. Trustee Guidelines**”). This Application has been prepared in accordance with General Order M-447, the *Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York* (June 17, 2013) promulgated pursuant to Local Bankruptcy Rule 2016-1(a) (the “**Local Guidelines**”), the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, entered on November 16, 2018, [ECF No.796] (the “**Interim Compensation Order**”), and the *Order Authorizing Appointment of Independent Fee Examiner Pursuant to 11 U.S.C. § 105(a) and*

Modifying Interim Compensation Procedures for Certain Professionals Employed Pursuant to 11 U.S.C. § 327 [ECF No. 3307] (the “**Fee Examiner Order**”).

4. This Fee Application summarizes the services rendered by FTI on behalf of the Committee during the Application Period. While it is not possible or practical to describe each and every activity undertaken by FTI, FTI has maintained contemporaneous time records which include a detailed chronology of the daily services rendered, describing the precise nature of the work, the specific tasks performed, and the time expended by each professional. A breakdown of the hours and fees by professional is annexed hereto as **Exhibit A**. A breakdown of the hours and fees by task code is annexed hereto as **Exhibit B**. A detailed copy of the time records for the Application Period is annexed hereto as **Exhibit C**.

5. In accordance with the Interim Compensation Order, FTI has requested payment for 80% of the fees for actual and necessary legal services incurred during the Application Period in the amount of \$212,911.20 (see page 2) and for 100% of the expenses incurred during the Application Period in the amount of \$0.00 for a total amount of \$212,911.20. FTI submitted the following monthly statements (each a “**Monthly Fee Statement**”) during the Application Period.

- i. On September 28, 2021, FTI filed the *Twenty Eighth Monthly Fee Statement of FTI Consulting, Inc for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisors to the Official Committee of Unsecured Creditors for the Period from July 1, 2021 Through August 31, 2021 Filed by Ira S. Dizengoff on behalf of Official Committee of Unsecured Creditors of Sears Holdings, et al.* [ECF No. 9856] seeking compensation for actual and necessary professional fees rendered in the amount of \$143,383.50 (and received payment of 80% of fees in the amount of \$114,706.80).

- ii. On November 23, 2021, FTI filed the *Twenty Ninth Monthly Fee Statement of FTI Consulting, Inc for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisors to the Official Committee of Unsecured Creditors for the Period from September 1, 2021 Through September 30, 2021 Filed by Ira S. Dizengoff on behalf of Official Committee of Unsecured Creditors of Sears Holdings, et al.* [ECF No. 10100] seeking compensation for actual and necessary professional fees rendered in the amount of \$46,036.00 (and received payment of 80% of fees in the amount of \$36,828.80).
- iii. On December 1, 2021, FTI filed the *Thirtieth Monthly Fee Statement of FTI Consulting, Inc for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisors to the Official Committee of Unsecured Creditors for the Period from October 1, 2021 Through October 31, 2021 Filed by Ira S. Dizengoff on behalf of Official Committee of Unsecured Creditors of Sears Holdings, et al.* [ECF No. 10117] seeking compensation for actual and necessary professional fees rendered in the amount of \$76,719.50 (to date, FTI has not yet received payment related to this Monthly Fee Statement).

6. As of the date of this Fee Application, FTI is owed \$114,603.40 for professional fees and \$0.00 for actual and necessary expenses for a total of \$114,603.40.

JURISDICTION

7. This Court has jurisdiction over this Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Application in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

8. On October 15, 2018 (the “**Petition Date**”), the Debtors filed with the United States Bankruptcy Court for the Southern District of New York (this “**Court**”) their voluntary petitions for relief under chapter 11 of the Bankruptcy Code. For the bankruptcy process, the Debtors selected Weil, Gotshal & Manges LLP as counsel (“**Weil**”), M-III Partners, LP as financial advisor (“**M-III**”), and Lazard Frères & Co as its investment banker (“**Lazard**”).

9. The Debtors continue to operate their businesses and manage their assets as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

10. On October 24, 2018, the Office of the United States Trustee for the Southern District (the “**US Trustee**”) filed a *Notice of Appointment of Official Committee of Unsecured Creditors* [ECF No. 276] pursuant to section 1102 of the Bankruptcy Code. At the Formation Meeting, the Committee selected Akin Gump Strauss Hauer & Feld LLP (“**Akin**”) as its counsel, and on October 25, 2018, the Committee selected FTI as its financial advisor. On October 29, 2018, the Committee selected Houlihan Lokey Capital Inc. as its investment banker (“**Houlihan**”).

11. As of the date of this Fee Application, the Committee is comprised of: (a) Pension Benefit Guaranty Corporation; (b) Oswaldo Cruz; (c) Winiadaewoo Electronics America; (d) Computershare Trust Company, N.A.; (e) The Bank of New York Mellon Trust Company; (f) Simon Property Group, L.P.; (g) Brixmor Operating Partnership, L.P.²

12. On December 19, 2018, the Court entered the *Order Authorizing the Retention of FTI Consulting Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Nunc Pro Tunc to October 25, 2018* [ECF No. 1325] (the “**Retention Order**”).

² At the Formation Meeting, the US Trustee appointed nine members to the Committee. However, Basil Vasiliou and Apex Tool Group, LLC resigned from the Committee on January 13, 2019 and March 31, 2020, respectively.

TERMS AND CONDITIONS OF EMPLOYMENT

13. FTI is compensated on an hourly fee basis, plus reimbursement of actual and necessary expenses incurred by FTI. For further information regarding the terms and conditions of FTI's retention, please see the Retention Order. FTI filed the Star Declaration in support of its retention on February 13, 2019 [ECF No. 2577].

SUMMARY OF SERVICES RENDERED

14. The Debtors' chapter 11 cases have presented numerous large and complex issues that had to be addressed in order to preserve and maximize value for unsecured creditors. The Retention Order authorized FTI to render financial advisory services to the Committee.

15. FTI has taken reasonable steps to avoid duplication of services by FTI's professionals. During the course of the Application Period, there have been a few instances where more than one FTI professional attended a hearing or conference. These multiple attendees were necessary to accomplish the significant amount of work which needed to be performed in a compressed amount of time involving complex facts and transactions and the participation to divide up the work was necessary under the circumstances.

16. The primary services during the Ninth Interim Period rendered by FTI include, but are not limited to, work in evaluating various proposals to continue financing litigation for the estate, analysis related to historical transactions, and diligence associated with preference-related matters. FTI's Fee Application and project billing format is generally consistent, or substantially conforms, with and is inclusive of all of the concepts in Exhibit A to the Local Guidelines, and includes additional detail, information, and categories.

REASONABLENESS OF FEES

17. FTI seeks compensation for actual, necessary professional services rendered and reimbursement of reasonable expenses incurred on behalf of the Committee during the Application Period. During the Application Period, FTI charged \$266,139.00 in fees. FTI submits that its fees are reasonable for the work performed in these cases and the results obtained.

18. All of the services for which interim compensation is sought herein were rendered for and on behalf of the Committee and not on behalf of any other entity. FTI respectfully submits that the professional services rendered were necessary, appropriate and have contributed to the effective administration of the Debtors' chapter 11 cases and maximization of value. It is respectfully submitted that the services rendered to the Committee were performed efficiently, effectively and economically, and the results obtained have benefited the unsecured creditor body as a whole and the Debtors' estates.

19. FTI believes that its billing rates in these Chapter 11 cases are "reasonable billing rates" for purposes of this Court's determination of the "reasonableness" of the fees for services rendered, appropriate for fees in these cases, and are in accordance with FTI's Retention Application. FTI's customary billing rates were disclosed in the retention papers and approved by this Court.

CONCLUSION

20. In accordance with the factors enumerated in section 331 of the Bankruptcy Code, the amounts requested herein are fair and reasonable given (a) the complexity of the cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

21. FTI submits that pursuant to the criteria normally examined in bankruptcy cases and based upon the factors considered in accordance with sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rule 2016, the results achieved provide more than sufficient justification for approval of the compensation sought by FTI.

22. As a result of FTI's efforts herein, it is respectfully submitted that FTI's efforts are resulting in a substantial benefit to the Committee and its constituents.

23. WHEREFORE, FTI respectfully requests that a ninth interim award for fees during the Application Period in the amount of \$266,139.00 and reimbursable expenses in the amount of \$0.00, totaling \$266,139.00 be granted and that this Court grant such other, further and different relief as it deems just and proper.

Dated: New York, New York
December 14, 2021

FTI CONSULTING, INC.
Financial Advisors to the Official Committee of
Unsecured Creditors of Sears Holdings Corporation

By: /s/ Matthew Diaz
Matthew Diaz, Senior Managing Director
Three Times Square, 10th Floor
New York, New York 10036
Telephone: (212) 499-3611
Email: matt.diaz@fticonsulting.com

Exhibit A

EXHIBIT A

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

SUMMARY OF HOURS BY PROFESSIONAL

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Professional	Position	Specialty	Billing Rate	Total Hours	Total Fees
Nelson, Cynthia A	Sr Managing Dir	Retail	\$ 1,120	0.2	\$ 224.00
Simms, Steven	Sr Managing Dir	Restructuring	1,295	0.7	906.50
Star, Samuel	Sr Managing Dir	Restructuring	1,165	2.4	2,796.00
Diaz, Matthew	Sr Managing Dir	Restructuring	1,120	46.9	52,528.00
Eisler, Marshall	Managing Director	Restructuring	885	92.2	81,597.00
Kim, Ye Darm	Sr Consultant	Restructuring	635	14.9	9,461.50
Shapiro, Jill	Sr Consultant	Restructuring	580	187.3	108,634.00
Lampert, Grace	Consultant	Restructuring	430	22.9	9,847.00
Hellmund-Mora, Marili	Project Asst	Restructuring	290	0.5	145.00
TOTAL				368.0	\$ 266,139.00

Exhibit B

EXHIBIT B

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

SUMMARY OF HOURS BY TASK

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Code	Task Description	Total Hours	Total Fees
1	Current Operating Results & Events	5.2	\$ 4,278.00
3	Financing Matters (DIP, Exit, Other)	285.6	\$ 212,218.00
5	Real Estate Issues	0.2	224.00
11	Prepare for and Attend Court Hearings	1.5	\$ 1,747.50
17	Wind Down Monitoring	14.3	10,749.50
18	Potential Avoidance Actions & Litigation	47.6	27,040.50
21	General Mtgs with UCC & UCC Counsel	2.9	2,524.50
24	Preparation of Fee Application	10.7	7,357.00
TOTAL		368.0	\$266,139.00

Exhibit C

EXHIBIT C

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
1	10/8/2021	Eisler, Marshall	0.8	Correspond with Debtors re: litigation funding.
1	10/12/2021	Shapiro, Jill	0.5	Participate in call with Debtors re: litigation funding.
1	10/12/2021	Eisler, Marshall	0.5	Participate in call with Debtors re: litigation funding.
1	10/12/2021	Eisler, Marshall	0.5	Participate in call with counsel re: Debtors cash flow update report.
1	10/12/2021	Shapiro, Jill	0.5	Participate in call with counsel re: Debtors cash flow update report.
1	10/13/2021	Shapiro, Jill	0.8	Prepare updates re: Debtors' cash flow assumptions.
1	10/13/2021	Eisler, Marshall	0.7	Respond to diligence questions arising from Debtors' cash flow.
1	10/14/2021	Diaz, Matthew	0.6	Review the updated cash flow report.
1	10/21/2021	Star, Samuel	0.3	Review October status report.
1 Total			5.2	
3	7/2/2021	Shapiro, Jill	0.5	Participate in call re: litigation funding.
3	7/2/2021	Eisler, Marshall	0.9	Evaluate key issues re: litigation funding.
3	7/2/2021	Kim, Ye Darm	0.5	Participate in call re: litigation funding.
3	7/6/2021	Shapiro, Jill	0.5	Participate on call re: litigation funding.
3	7/6/2021	Eisler, Marshall	1.2	Provide follow up comments to litigation funding materials.
3	7/6/2021	Kim, Ye Darm	0.5	Participate on call re: litigation funding.
3	7/6/2021	Kim, Ye Darm	3.4	Prepare updates to litigation funding materials.
3	7/7/2021	Shapiro, Jill	2.6	Prepare materials re: litigation funding.
3	7/7/2021	Shapiro, Jill	0.6	Participate in call re: litigation funding.
3	7/7/2021	Eisler, Marshall	1.6	Provide follow up comments to litigation funding materials.
3	7/7/2021	Kim, Ye Darm	0.6	Participate in call re: litigation funding. .
3	7/7/2021	Kim, Ye Darm	2.1	Update materials re: litigation funding.
3	7/8/2021	Shapiro, Jill	1.1	Participate in call re: litigation funding.
3	7/8/2021	Shapiro, Jill	2.4	Prepare materials re: litigation funding.
3	7/8/2021	Eisler, Marshall	1.2	Correspond with Counsel re: litigation funding materials.
3	7/8/2021	Kim, Ye Darm	0.6	Prepare materials re: litigation funding.
3	7/8/2021	Kim, Ye Darm	1.1	Participate in call re: litigation funding.
3	7/8/2021	Kim, Ye Darm	2.9	Revise litigation funding materials.
3	7/8/2021	Kim, Ye Darm	3.2	Update litigation funding materials.
3	7/9/2021	Shapiro, Jill	0.6	Evaluate issues re: litigation funding.
3	7/12/2021	Diaz, Matthew	1.3	Review key issues re: litigation funding.
3	7/12/2021	Shapiro, Jill	0.7	Prepare materials re: litigation funding.
3	7/12/2021	Shapiro, Jill	0.9	Update materials re: litigation funding.
3	7/12/2021	Eisler, Marshall	0.9	Evaluate issues re: litigation funding materials.
3	7/13/2021	Diaz, Matthew	1.1	Review materials re: litigation funding.
3	7/13/2021	Shapiro, Jill	3.5	Prepare materials in connection with litigation funding.
3	7/13/2021	Eisler, Marshall	1.3	Prepare analysis re: litigation funding.
3	7/14/2021	Diaz, Matthew	0.5	Review the updated litigation funding materials.
3	7/14/2021	Diaz, Matthew	0.3	Evaluate issues re: litigation funding.
3	7/14/2021	Shapiro, Jill	1.3	Update materials in connection with litigation funding.
3	7/14/2021	Eisler, Marshall	1.8	Correspond with Counsel re: litigation funding materials.
3	7/15/2021	Diaz, Matthew	0.9	Review the updated litigation funding materials.
3	7/15/2021	Shapiro, Jill	3.8	Prepare analysis re: litigation funding.
3	7/15/2021	Shapiro, Jill	0.9	Update materials re: litigation funding.
3	7/16/2021	Diaz, Matthew	1.1	Review materials re: litigation funding.
3	7/16/2021	Shapiro, Jill	2.4	Update materials re: litigation funding.
3	7/16/2021	Eisler, Marshall	0.8	Provide additional comments to litigation funding materials.
3	7/19/2021	Diaz, Matthew	0.7	Review litigation funding materials.
3	7/19/2021	Shapiro, Jill	1.4	Prepare materials re: litigation funding.
3	7/19/2021	Eisler, Marshall	1.4	Analyze litigation funding materials.
3	7/20/2021	Diaz, Matthew	0.7	Review materials re: litigation funding.

EXHIBIT C

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
3	7/20/2021	Shapiro, Jill	0.8	Evaluate issues re: litigation funding.
3	7/20/2021	Shapiro, Jill	1.1	Update materials re: litigation funding.
3	7/20/2021	Eisler, Marshall	1.8	Review litigation funding materials.
3	7/21/2021	Shapiro, Jill	0.6	Prepare materials in connection with litigation funding.
3	7/26/2021	Shapiro, Jill	1.9	Update materials re: litigation funding.
3	7/26/2021	Eisler, Marshall	0.9	Provide follow up comments re: litigation funding materials.
3	7/27/2021	Shapiro, Jill	3.5	Prepare materials re: litigation funding.
3	7/27/2021	Eisler, Marshall	0.7	Evaluate issues re: litigation funding materials.
3	7/28/2021	Diaz, Matthew	1.5	Review the litigation funding materials.
3	7/28/2021	Diaz, Matthew	0.7	Perform detailed review of litigation funding materials.
3	7/28/2021	Shapiro, Jill	2.2	Prepare materials re: litigation funding.
3	7/28/2021	Eisler, Marshall	1.2	Provide follow up comments to litigation funding materials.
3	8/2/2021	Shapiro, Jill	0.3	Update litigation funding materials.
3	8/3/2021	Diaz, Matthew	0.3	Review the updated litigation funding materials.
3	8/3/2021	Shapiro, Jill	0.4	Prepare materials re: litigation funding.
3	8/4/2021	Diaz, Matthew	0.7	Evaluate the litigation funding issues.
3	8/4/2021	Shapiro, Jill	1.4	Update materials re: litigation funding.
3	8/4/2021	Diaz, Matthew	0.6	Review updated litigation funding materials.
3	8/5/2021	Shapiro, Jill	0.3	Prepare materials re: litigation funding.
3	8/6/2021	Diaz, Matthew	1.6	Review the updated litigation funding materials.
3	8/6/2021	Shapiro, Jill	3.3	Prepare analysis re: litigation funding materials.
3	8/7/2021	Shapiro, Jill	0.5	Update analysis re: litigation funding materials.
3	8/9/2021	Shapiro, Jill	2.9	Prepare materials re: litigation funding.
3	8/9/2021	Diaz, Matthew	1.6	Review and update litigation funding materials.
3	8/9/2021	Eisler, Marshall	2.3	Update litigation funding materials.
3	8/10/2021	Diaz, Matthew	0.8	Review latest litigation funding materials.
3	8/10/2021	Diaz, Matthew	0.3	Draft correspondence to Counsel re: litigation funding materials.
3	8/10/2021	Shapiro, Jill	0.4	Review materials re: litigation funding.
3	8/10/2021	Eisler, Marshall	0.8	Correspond with Counsel re: litigation funding issues.
3	8/12/2021	Diaz, Matthew	0.6	Review the updated litigation funding materials.
3	8/12/2021	Shapiro, Jill	3.1	Prepare materials re: litigation funding.
3	8/12/2021	Eisler, Marshall	1.3	Correspond with Counsel re: litigation funding materials.
3	8/12/2021	Eisler, Marshall	0.8	Provide comments to litigation funding materials.
3	8/13/2021	Diaz, Matthew	0.4	Participate in call re: litigation funding materials.
3	8/13/2021	Diaz, Matthew	1.2	Review the updated litigation funding materials.
3	8/13/2021	Diaz, Matthew	0.6	Provide comments to the litigation funding materials.
3	8/13/2021	Diaz, Matthew	0.7	Review materials re: litigation funding.
3	8/13/2021	Shapiro, Jill	3.4	Prepare materials re: litigation funding.
3	8/13/2021	Shapiro, Jill	0.9	Evaluate key issues re: litigation funding.
3	8/13/2021	Shapiro, Jill	0.4	Participate in call re: litigation funding materials.
3	8/13/2021	Eisler, Marshall	0.4	Participate in call re: litigation funding materials.
3	8/13/2021	Eisler, Marshall	0.8	Review litigation funding materials.
3	8/16/2021	Diaz, Matthew	0.9	Review the updated materials re: litigation funding.
3	8/16/2021	Shapiro, Jill	1.2	Prepare materials re: litigation funding.
3	8/16/2021	Eisler, Marshall	1.8	Provide comments to latest litigation funding materials.
3	8/17/2021	Diaz, Matthew	0.6	Review the litigation funding materials.
3	8/17/2021	Shapiro, Jill	2.0	Update materials re: litigation funding.
3	8/17/2021	Eisler, Marshall	1.3	Provide comments to litigation funding materials.
3	8/17/2021	Eisler, Marshall	0.9	Correspond with Counsel re: litigation funding materials.
3	8/18/2021	Diaz, Matthew	0.5	Participate in call with Counsel to discuss litigation funding issues.
3	8/18/2021	Diaz, Matthew	0.7	Review the updated litigation funding materials.

EXHIBIT C

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
3	8/18/2021	Shapiro, Jill	0.8	Prepare materials re: litigation funding.
3	8/18/2021	Shapiro, Jill	0.4	Evaluate issues re: litigation funding.
3	8/18/2021	Shapiro, Jill	0.5	Participate in call with Counsel to discuss litigation funding issues.
3	8/18/2021	Eisler, Marshall	1.8	Correspond with Counsel re: litigation funding materials.
3	8/20/2021	Diaz, Matthew	0.8	Review the updated litigation funding materials.
3	8/23/2021	Diaz, Matthew	1.1	Evaluate issues re: latest litigation funding materials.
3	8/23/2021	Shapiro, Jill	3.7	Prepare materials re: litigation funding.
3	8/23/2021	Shapiro, Jill	3.2	Update materials re: litigation funding.
3	8/23/2021	Eisler, Marshall	2.1	Revise litigation funding materials.
3	8/23/2021	Eisler, Marshall	2.8	Review materials re: litigation funding.
3	8/23/2021	Eisler, Marshall	2.1	Evaluate issues re: litigation funding.
3	8/24/2021	Star, Samuel	0.5	Review litigation funding materials.
3	8/24/2021	Diaz, Matthew	1.3	Review materials re: litigation funding.
3	8/24/2021	Shapiro, Jill	2.5	Prepare materials re: litigation funding.
3	8/24/2021	Shapiro, Jill	3.5	Update materials re: litigation funding.
3	8/24/2021	Shapiro, Jill	0.9	Update materials re: litigation funding.
3	8/24/2021	Eisler, Marshall	1.9	Prepare materials in connection with litigation funding.
3	8/24/2021	Eisler, Marshall	1.1	Review materials re: litigation funding.
3	8/24/2021	Eisler, Marshall	1.2	Provide comments to litigation funding materials.
3	8/24/2021	Eisler, Marshall	0.9	Respond to diligence questions re: litigation funding issues.
3	8/24/2021	Eisler, Marshall	0.7	Review litigation funding materials.
3	8/25/2021	Shapiro, Jill	3.3	Prepare materials re: litigation funding.
3	8/25/2021	Shapiro, Jill	0.7	Participate in call with designees.
3	8/25/2021	Eisler, Marshall	1.1	Respond to diligence requests re: litigation funding issues.
3	8/25/2021	Eisler, Marshall	0.7	Prepare for call with Designees re: litigation funding.
3	8/25/2021	Eisler, Marshall	0.7	Participate in call with designees.
3	8/26/2021	Shapiro, Jill	2.1	Prepare materials re: litigation funding.
3	8/26/2021	Eisler, Marshall	2.9	Respond to diligence requests re: litigation funding issues.
3	8/29/2021	Shapiro, Jill	0.5	Update litigation funding materials.
3	8/30/2021	Eisler, Marshall	1.3	Provide comments to litigation funding materials.
3	8/31/2021	Shapiro, Jill	1.8	Prepare materials re: litigation funding.
3	9/1/2021	Shapiro, Jill	0.7	Prepare materials re: litigation funding.
3	9/2/2021	Shapiro, Jill	0.4	Review key issues re: litigation funding.
3	9/9/2021	Diaz, Matthew	0.5	Participate in a call with counsel re: litigation funding materials.
3	9/9/2021	Diaz, Matthew	0.6	Review the updated litigation funding materials.
3	9/9/2021	Shapiro, Jill	3.8	Prepare materials re: litigation funding.
3	9/9/2021	Shapiro, Jill	0.3	Update materials re: litigation funding.
3	9/9/2021	Shapiro, Jill	0.5	Participate in a call with counsel re: litigation funding materials.
3	9/10/2021	Diaz, Matthew	0.9	Review the updated litigation funding materials.
3	9/10/2021	Shapiro, Jill	0.8	Prepare materials re: litigation funding.
3	9/10/2021	Shapiro, Jill	0.4	Participate on call with Counsel re: litigation funding.
3	9/11/2021	Shapiro, Jill	1.2	Prepare materials re: litigation funding.
3	9/13/2021	Diaz, Matthew	0.7	Review materials re: litigation funding.
3	9/13/2021	Shapiro, Jill	1.6	Prepare materials re: litigation funding.
3	9/14/2021	Diaz, Matthew	0.6	Review key issues re: litigation funding.
3	9/14/2021	Diaz, Matthew	0.3	Participate in a call with Akin re: litigation funding.
3	9/14/2021	Shapiro, Jill	1.7	Prepare materials re: litigation funding.
3	9/14/2021	Shapiro, Jill	0.3	Review materials re: litigation funding.
3	9/14/2021	Shapiro, Jill	0.4	Participate on call with counsel re: litigation funding.
3	9/15/2021	Diaz, Matthew	0.3	Review litigation funding materials.
3	9/15/2021	Shapiro, Jill	0.9	Prepare materials re: litigation funding.

EXHIBIT C

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
3	9/17/2021	Diaz, Matthew	0.3	Review litigation funding materials.
3	9/20/2021	Shapiro, Jill	2.7	Prepare materials re: litigation funding.
3	9/20/2021	Eisler, Marshall	1.1	Review updated litigation funding materials.
3	9/20/2021	Eisler, Marshall	0.8	Provide comments re: litigation funding materials.
3	9/21/2021	Diaz, Matthew	1.1	Review the updated funding materials.
3	9/21/2021	Shapiro, Jill	2.9	Prepare materials re: litigation funding.
3	9/21/2021	Eisler, Marshall	2.1	Provide comments to litigation funding materials.
3	9/21/2021	Eisler, Marshall	0.8	Review and comment on litigation funding materials.
3	9/22/2021	Diaz, Matthew	0.9	Review the updated funding materials.
3	9/22/2021	Shapiro, Jill	1.5	Prepare litigation funding materials.
3	9/22/2021	Shapiro, Jill	0.6	Review key issues re: litigation funding.
3	9/22/2021	Shapiro, Jill	0.6	Participate on call with counsel re: litigation funding.
3	9/22/2021	Eisler, Marshall	1.8	Incorporate comments re: litigation funding materials.
3	9/23/2021	Diaz, Matthew	0.6	Review the updated materials re: litigation funding.
3	9/23/2021	Shapiro, Jill	0.3	Update materials re: litigation funding.
3	9/23/2021	Eisler, Marshall	1.2	Correspond with counsel re: litigation funding issues.
3	9/24/2021	Shapiro, Jill	3.6	Prepare materials re: litigation funding.
3	9/24/2021	Eisler, Marshall	1.2	Review updated litigation funding materials.
3	9/27/2021	Shapiro, Jill	1.0	Prepare materials re: litigation funding.
3	9/27/2021	Eisler, Marshall	1.9	Prepare materials re: litigation funding.
3	9/28/2021	Eisler, Marshall	1.3	Review key issues re: litigation funding.
3	9/30/2021	Eisler, Marshall	1.8	Prepare materials re: litigation funding.
3	9/30/2021	Shapiro, Jill	0.2	Prepare materials re: litigation funding.
3	10/1/2021	Shapiro, Jill	2.8	Prepare materials re: litigation funding.
3	10/1/2021	Shapiro, Jill	1.4	Prepare materials re: litigation funding for administrative representative.
3	10/1/2021	Eisler, Marshall	1.9	Update litigation funding materials.
3	10/3/2021	Shapiro, Jill	0.5	Prepare materials re: litigation funding.
3	10/4/2021	Shapiro, Jill	0.1	Participate in call with counsel re: litigation funding.
3	10/4/2021	Shapiro, Jill	1.9	Prepare report for administrative representative re: litigation funding.
3	10/4/2021	Shapiro, Jill	1.7	Prepare materials re: litigation funding.
3	10/5/2021	Diaz, Matthew	0.6	Review the updated litigation funding materials.
3	10/5/2021	Shapiro, Jill	3.4	Update materials re: litigation funding.
3	10/5/2021	Eisler, Marshall	1.8	Correspond with counsel re: presentation to Designees on case issues.
3	10/6/2021	Diaz, Matthew	0.7	Review the updated litigation funding materials.
3	10/6/2021	Shapiro, Jill	0.2	Prepare materials re: litigation funding.
3	10/6/2021	Eisler, Marshall	1.9	Provide analysis in response to Designee questions.
3	10/7/2021	Shapiro, Jill	2.0	Prepare report for the administrative representative.
3	10/7/2021	Shapiro, Jill	0.9	Prepare materials re: litigation funding analysis.
3	10/7/2021	Eisler, Marshall	1.4	Provide comments to presentation for administrative representative re: status update.
3	10/8/2021	Diaz, Matthew	1.1	Review the litigation funding materials for the administrative representative.
3	10/8/2021	Shapiro, Jill	0.7	Prepare materials re: litigation funding.
3	10/8/2021	Shapiro, Jill	0.9	Update deck for the administrative representative.
3	10/8/2021	Shapiro, Jill	1.2	Prepare litigation funding materials.
3	10/8/2021	Shapiro, Jill	0.7	Prepare materials for designee update deck.
3	10/8/2021	Eisler, Marshall	1.3	Review updated presentation to the Designee re: update on case issues.
3	10/9/2021	Eisler, Marshall	1.9	Provide comments to presentation for administrative representative re: status update.
3	10/10/2021	Shapiro, Jill	2.6	Update materials for the administrative representative.
3	10/10/2021	Eisler, Marshall	1.9	Update presentation for administrative representative re: case update.
3	10/11/2021	Diaz, Matthew	0.9	Review the litigation funding materials.

EXHIBIT C

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
3	10/11/2021	Shapiro, Jill	3.7	Update materials re: litigation funding.
3	10/11/2021	Eisler, Marshall	2.1	Update presentation for administrative representative re: case update.
3	10/12/2021	Diaz, Matthew	1.1	Review the litigation funding materials.
3	10/12/2021	Shapiro, Jill	0.3	Update materials re: litigation funding.
3	10/12/2021	Shapiro, Jill	1.0	Update litigation funding materials.
3	10/12/2021	Shapiro, Jill	3.8	Update litigation funding materials.
3	10/13/2021	Eisler, Marshall	0.5	Participate on pre-effective committee call.
3	10/13/2021	Shapiro, Jill	0.5	Participate on pre-effective committee call.
3	10/13/2021	Diaz, Matthew	0.9	Review the updated litigation funding materials.
3	10/13/2021	Shapiro, Jill	3.7	Update litigation funding materials.
3	10/13/2021	Shapiro, Jill	1.4	Prepare litigation funding materials.
3	10/13/2021	Shapiro, Jill	0.8	Update litigation funding materials.
3	10/13/2021	Eisler, Marshall	0.4	Prepare for pre-effective date committee call.
3	10/14/2021	Diaz, Matthew	1.5	Review the updated litigation funding materials.
3	10/14/2021	Shapiro, Jill	3.1	Update materials re: litigation funding.
3	10/14/2021	Shapiro, Jill	0.7	Review key issues re: litigation funding.
3	10/14/2021	Shapiro, Jill	0.4	Prepare materials re: litigation funding.
3	10/14/2021	Shapiro, Jill	0.5	Update materials re: litigation funding.
3	10/14/2021	Eisler, Marshall	0.8	Incorporate comments on presentation to administrative representative re: case update.
3	10/14/2021	Eisler, Marshall	1.1	Review materials re: litigation funding.
3	10/15/2021	Diaz, Matthew	0.6	Participate in pre-call with counsel in preparation for call with administrative representative.
3	10/15/2021	Shapiro, Jill	0.6	Participate in pre-call with counsel in preparation for call with administrative representative.
3	10/15/2021	Shapiro, Jill	0.4	Update litigation funding materials.
3	10/18/2021	Shapiro, Jill	3.0	Prepare materials re: litigation funding.
3	10/19/2021	Diaz, Matthew	0.6	Review the updated litigation funding materials.
3	10/19/2021	Shapiro, Jill	1.3	Update materials re: litigation funding.
3	10/20/2021	Shapiro, Jill	0.3	Update materials re: litigation funding.
3	10/21/2021	Diaz, Matthew	1.0	Participate in a call with the administrative representative to discuss the go forward financing.
3	10/21/2021	Shapiro, Jill	1.0	Participate in a call with the administrative representative to discuss the go forward financing.
3	10/26/2021	Shapiro, Jill	0.3	Review draft term sheet.
3 Total			285.6	
5	7/6/2021	Nelson, Cynthia A	0.2	Review proposed property sale by Debtors.
5 Total			0.2	
11	9/27/2021	Star, Samuel	1.5	Attend court hearing re: fee applications, preference claims and transform APA.
11 Total			1.5	
17	7/13/2021	Shapiro, Jill	3.8	Prepare update report for the UCC.
17	7/14/2021	Diaz, Matthew	0.6	Review operating report update to be presented to the Committee.
17	7/14/2021	Diaz, Matthew	0.4	Review the Debtors' status report to prepare for the UCC meeting.
17	7/14/2021	Shapiro, Jill	1.9	Update status report for the UCC.
17	7/14/2021	Simms, Steven	0.3	Review MTN items.
17	7/14/2021	Simms, Steven	0.4	Review update from Counsel and advisors.
17	7/27/2021	Star, Samuel	0.1	Review status report filed with the court.
17	7/27/2021	Eisler, Marshall	0.8	Participate in status update hearing.
17	7/28/2021	Diaz, Matthew	0.5	Review the updated Sears status report.
17	7/30/2021	Shapiro, Jill	0.7	Review status report and prepare questions for M-III re: updated assumptions.

EXHIBIT C

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DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
17	9/27/2021	Eisler, Marshall	0.9	Review updated cash flow documents as provided by the Debtors.
17	9/28/2021	Diaz, Matthew	0.6	Review the updated cash flow and confirmation status report.
17	9/29/2021	Shapiro, Jill	1.6	Prepare analysis re: preference recoveries.
17	9/30/2021	Eisler, Marshall	0.8	Correspond w/ M-III re: cash flow forecasts.
17	10/7/2021	Shapiro, Jill	0.9	Participate on call with M-III re: preferences and provide update to team.
17 Total			14.3	
18	7/1/2021	Shapiro, Jill	3.2	Prepare historical transaction analysis.
18	7/7/2021	Shapiro, Jill	2.9	Update historical transaction analysis.
18	7/9/2021	Shapiro, Jill	1.7	Revise historical transaction analysis.
18	7/22/2021	Eisler, Marshall	1.2	Correspond with Counsel re: document retention issues.
18	7/23/2021	Diaz, Matthew	0.4	Review document retention issues.
18	8/31/2021	Shapiro, Jill	0.4	Respond to request re: Seritage capital structure.
18	9/22/2021	Shapiro, Jill	0.2	Prepare historical transaction analysis.
18	9/24/2021	Shapiro, Jill	0.2	Review historical transaction analysis.
18	9/28/2021	Diaz, Matthew	0.9	Review analysis re: historical holdings.
18	9/30/2021	Shapiro, Jill	0.3	Prepare analysis re: preference recoveries.
18	9/30/2021	Shapiro, Jill	0.5	Review analysis re: historical transactions.
18	10/1/2021	Lampert, Grace	3.1	Review various motions and orders to understand litigation background.
18	10/1/2021	Eisler, Marshall	0.9	Review litigation defendant analysis.
18	10/1/2021	Shapiro, Jill	1.3	Prepare historical transaction analysis.
18	10/4/2021	Shapiro, Jill	2.2	Prepare analysis re: litigation defendants historical holdings.
18	10/5/2021	Lampert, Grace	0.5	Prepare historical transaction analysis.
18	10/5/2021	Shapiro, Jill	0.5	Review historical transaction analysis.
18	10/5/2021	Lampert, Grace	1.2	Research Sears litigation status and background.
18	10/5/2021	Lampert, Grace	1.8	Prepare litigation defendant analysis.
18	10/5/2021	Eisler, Marshall	0.4	Correspond with counsel re: insider transactions.
18	10/6/2021	Lampert, Grace	2.7	Review source documents in connection with defendant analysis.
18	10/7/2021	Lampert, Grace	0.8	Update historical transaction deck.
18	10/7/2021	Shapiro, Jill	0.8	Provide comments to historical transaction deck.
18	10/7/2021	Lampert, Grace	2.8	Prepare analysis in connection with defendant analysis.
18	10/7/2021	Lampert, Grace	3.1	Update analysis in connection with defendant analysis.
18	10/7/2021	Shapiro, Jill	0.2	Review historical transaction analysis.
18	10/8/2021	Lampert, Grace	0.3	Prepare additional updates to defendant analysis.
18	10/8/2021	Shapiro, Jill	0.3	Revise historical defendant analysis.
18	10/8/2021	Lampert, Grace	3.4	Prepare updates to analysis in connection with defendant analysis.
18	10/8/2021	Eisler, Marshall	0.7	Correspond with counsel re: insider transactions.
18	10/8/2021	Shapiro, Jill	0.3	Update report re: historical transaction analysis.
18	10/8/2021	Shapiro, Jill	0.4	Prepare historical transaction analysis.
18	10/11/2021	Eisler, Marshall	1.9	Review materials re: litigation funding.
18	10/12/2021	Eisler, Marshall	1.1	Review litigation defendant analysis.
18	10/13/2021	Eisler, Marshall	0.9	Correspond with Akin re: litigation financing.
18	10/25/2021	Shapiro, Jill	0.5	Participate on call with Akin re: historical defendants analysis.
18	10/27/2021	Lampert, Grace	0.4	Prepare workplan for defendant analysis.
18	10/27/2021	Shapiro, Jill	0.4	Review and update workplan for defendant analysis.
18	10/27/2021	Lampert, Grace	2.8	Update workplan re: litigation defendant analysis.
18 Total			47.6	
21	7/14/2021	Eisler, Marshall	1.1	Prepare for UCC call re: wind down budget.
21	7/14/2021	Eisler, Marshall	0.6	Participate in UCC update call.
21	7/14/2021	Diaz, Matthew	0.6	Participate in UCC update call.
21	7/14/2021	Shapiro, Jill	0.6	Participate in UCC update call.
21 Total			2.9	

EXHIBIT C

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

DETAIL OF TIME ENTRIES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Task Category	Date	Professional	Hours	Activity
24	7/22/2021	Shapiro, Jill	0.6	Prepare June fee statement.
24	7/23/2021	Shapiro, Jill	0.2	Prepare June fee statement.
24	7/26/2021	Shapiro, Jill	0.6	Update June fee statement.
24	7/28/2021	Hellmund-Mora, Marili	0.5	Update and finalize the June fee statement.
24	8/10/2021	Shapiro, Jill	1.8	Prepare interim fee application.
24	8/11/2021	Diaz, Matthew	0.6	Review the interim fee application.
24	8/11/2021	Shapiro, Jill	0.3	Update interim fee application.
24	8/12/2021	Shapiro, Jill	0.6	Finalize interim fee application.
24	9/14/2021	Diaz, Matthew	0.3	Review Orient fee objection.
24	9/20/2021	Shapiro, Jill	2.4	Prepare the combined July/August monthly fee statement.
24	9/21/2021	Diaz, Matthew	0.8	Review the combined July/August fee statement.
24	9/21/2021	Diaz, Matthew	0.5	Review the response to the Orient objection to the Committee's advisors fees.
24	9/22/2021	Diaz, Matthew	0.2	Review the proposed interim order.
24	9/22/2021	Shapiro, Jill	0.3	Review draft interim order and reconcile with FTI records.
24	9/27/2021	Shapiro, Jill	1.0	Update and finalize fee statement.
24 Total			10.7	
Grand Total			368.0	

Exhibit D

EXHIBIT D

SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538

SUMMARY OF EXPENSES

FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021

Expense Type	Amount
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Not Applicable in this month.

Exhibit E

EXHIBIT E**SEARS HOLDINGS CORPORATION, et al. - CASE NO. 18-23538****EXPENSE DETAIL****FOR THE PERIOD JULY 1, 2021 TO OCTOBER 31, 2021**

Date	Professional	Expense Type	Expense Detail	Amount
Not Applicable in this month.				